

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA : **Affirmation in Support
of Application for
Order of Continuance**
- v. - :
:

TODD KOZEL : 18 Mag. 10663
:
Defendant. :
:
- - - - - x

State of New York)
County of New York : ss.:
Southern District of New York)

Sarah E. Paul, pursuant to Title 28, United States Code,
Section 1746, hereby declares under penalty of perjury:

1. I am an Assistant United States Attorney in the Office
of Geoffrey S. Berman, United States Attorney for the Southern
District of New York. I submit this affirmation in support of
an application for an order of continuance of the time within
which an indictment or information would otherwise have to be
filed, pursuant to 18 U.S.C. § 3161(h)(7)(A).

2. On December 18, 2018, the defendant was arrested after
being charged in a complaint, dated December 14, 2018, with
violations of 18 U.S.C. §§ 1343, 1349, and 1956(h), as well as
18 U.S.C. § 2. On the day of his arrest, the defendant was
presented before Magistrate Judge Debra Freeman. The defendant
was released the following day on a set of bail conditions. The
defendant is represented by David Meister, Esq.

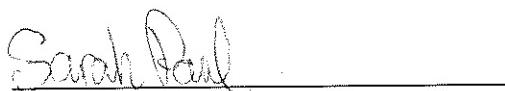
3. As set by Judge Freeman during the defendant's presentment, the Government currently has until January 17, 2019 to charge the defendant by indictment or information.

4. Mr. Meister and I have had discussions regarding a possible disposition of this case. The negotiations have not been completed and we plan to continue our discussions, but do not anticipate a resolution before the deadline under Rule 5.1 expires on January 17, 2019.

5. Therefore, the Government is requesting a 30-day continuance until February 18, 2019, to continue the foregoing discussions and reach a disposition of this matter. Earlier this month, I personally communicated with defense counsel and he specifically consented to this request.

6. For the reasons stated above, the ends of justice served by the granting of the requested continuance outweigh the best interests of the public and defendant in a speedy trial.

Dated: New York, New York
January 17, 2019


Sarah E. Paul

Sarah E. Paul
Assistant United States Attorney
Southern District of New York
212-637-2326